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August 20, 2015

SUBMITTED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Notice of Ex Parte Communication

Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Information on Current Trends in LTE-U and LAA Technology, ET Docket No. 15-105

Dear Ms. Dortch:

On August 18, 2015, T-Mobile US, Inc. (“T-Mobile”) Chief Technology Officer, Neville Ray, and other T-Mobile representatives, Karri Kuoppamaki, John Hunter and I, met with Julius Knapp, Aspasia Paroutsas, Martin Doczkat and Brian Butler of the Office of Engineering and Technology and Roger Sherman, Brian Regan and John Leibovitz of the Wireless Telecommunications Bureau regarding the above-referenced matter.

We expressed our plans to deploy the Long Term Evolution (“LTE”) technology that is being developed for use on unlicensed spectrum (“LTE-U”), to enhance our customers’ overall experience by providing greater capacity and improving their quality of service in areas of high demand. We discussed our industry leading use of Wi-Fi technology. In a highly competitive wireless marketplace, T-Mobile has innovated with Wi-Fi to improve our coverage to enable our customers to make calls and access the Internet inside buildings and the home. T-Mobile expressed its strong commitment to ensuring that Wi-Fi remains robust and is not adversely impacted by the deployment of LTE-U.

T-Mobile explained that the FCC’s technology-neutral approach to use of the unlicensed bands has been highly successful, and there is no reason to deviate from that approach as LTE-U meets all Part 15 requirements and includes strong coexistence mechanisms. Testing shows that LTE-U has less of an impact on Wi-Fi operations than would occur by adding an additional Wi-Fi access point.^{1/} We also explained that if multiple operators deploy LTE-U in an area, the access

^{1/} See Letter from Dean R. Brenner, Senior Vice President, Government Affairs, QUALCOMM Incorporated, to Ms. Marlene H. Dortch, Secretary, FCC, ET Docket No. 15-105 (filed July 15, 2015); see also Reply Comments of QUALCOMM Incorporated, ET Docket No. 15-105, at 4-5 (filed June 26,

points treat each other as another user and take those operations into account just as they would additional Wi-Fi access points, as part of a fair sharing approach. Claims by LTE-U opponents, particularly cable companies, that the technology will adversely impact Wi-Fi operations are based on testing with parameters set at extremes that do not represent realistic deployments or do not reflect actual LTE-U specifications. While cable companies defend these tests by noting that carriers have the ability to adjust LTE-U parameters, the ability to adjust parameters allows a carrier to refine operations based on the environment – a result that will promote equitable sharing. Further, LTE-U's connection to licensed spectrum through a control channel allows carriers to better address problems if they should occur. We indicated our intent to begin LTE-U trials in 2016, but expressed our support for fair and neutral testing to demonstrate compatibility based on reasonable and realistic deployment scenarios.

T-Mobile emphasized that the rapid deployment of LTE technology in unlicensed spectrum promotes innovation and consumer benefit without consumer harm and should not be blocked by the self-interest of cable companies seeking to limit competition.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. A copy of this letter is also being provided to FCC staff that participated in each meeting.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Steve B. Sharkey

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cc: (each electronically)
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